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Chapter 7 Trustee*

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

In re:

ANTE MARKOTA,

Debtor.

Case No. 15-15565 (CMG)

Honorable Christine M. Gravelle

Chapter 7

**NOTICE OF MOTION OF JOHN M. McDONNELL, CHAPTER 7
TRUSTEE, FOR ENTRY OF AN ORDER AUTHORIZING
TRUSTEE TO DESTROY AND/OR ABANDON BOOKS AND
RECORDS OF DEBTOR; AND GRANTING RELATED RELIEF**

PLEASE TAKE NOTICE that on **January 30, 2018 at 10:00 a.m.**, or as soon thereafter as counsel may be heard, the undersigned counsel for John M. McDonnell, the chapter 7 trustee (the “Trustee”) for Ante Markota, the chapter 7 debtor (the “Debtor”), shall move before the Honorable Christine M. Gravelle, United States Bankruptcy Judge for the District Court of New Jersey, at the United States Bankruptcy Court, 402 East State Street, Trenton, New Jersey 08608, seeking entry of an order authorizing the Trustee, and/or the Trustee’s professionals, to destroy and/or abandon certain books and records of the Debtor, and granting related relief (the “Motion”).

PLEASE TAKE FURTHER NOTICE that in support of the Trustee’s motion, the undersigned shall rely upon the Application in support of the Motion and the proposed form of

Order filed herewith. The nature of the relief requested does not require that briefs be submitted as required pursuant to D.N.J. LBR 9013-1.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Motion shall: (i) be in writing; (ii) state with particularity the basis of the objection; and (iii) be filed with the Clerk of the United States Bankruptcy Court electronically by attorneys who regularly practice before the Bankruptcy Court in accordance with the General Order Regarding Electronic Means for Filing, Signing, and Verification of Documents dated March 27, 2002 (the “General Order”) and the Commentary Supplementing Administrative Procedures dated as of March 2004 (the “Supplemental Commentary”) (the General Order, the Supplemental Commentary, and the User’s Manual for the Electronic Case Filing System can be found at www.njb.uscourts.gov, the official website for the Bankruptcy Court) and, by all other parties-in-interest, on CD-ROM in Portable Document Format (PDF), and shall be served in accordance with the General Order, the Supplemental Commentary, and D.N.J. LBR 9013-2, as amended August 1, 2015, so as to be received no later than seven (7) days before the return date of the Motion.

PLEASE TAKE FURTHER NOTICE that unless an objection is timely filed and served, the Motion shall be deemed uncontested in accordance with D.N.J. LBR 9013-3(d) and the relief may be granted without a hearing.

McDonnell Crowley, LLC
Counsel for John M. McDonnell,
Chapter 7 Trustee

Dated: January 2, 2018

By: /s/ Brian T. Crowley
BRIAN T. CROWLEY